

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**GARY PAGELS, On Behalf of Himself  
and All Others Similarly Situated,**  
14322 Stratford Road  
Riverview, MI 48193,

Plaintiff,

vs.

**JESSE WILLMS, Individually and as  
Owner and Operator of Terra  
Marketing Group**  
#300, 85 Cranford Way  
Sherwood Park, AB  
T8H 0H9

**et al.,**

Defendants.

Case No. 2:12-cv-11936-GER-DRG

**STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS  
JESSE WILLMS, 1524948 ALBERTA LTD., TERRA MARKETING  
GROUP, AND TRUE NET LLC TO FILE RESPONSE TO COMPLAINT**

Plaintiff Gary Pagels ("Plaintiff") and Defendants Jesse Willms, 1524948 Alberta Ltd., Terra Marketing Group, and True Net LLC (collectively, "Defendants"), by and through their attorneys of record, STIPULATE AS FOLLOWS:

WHEREAS, Defendants were served with the Complaint on June 11, 2012;

WHEREAS, Defendants and Plaintiff stipulated to an extension of July 16, 2012;

WHEREAS, on July 12, 2012, pursuant to Local Rule 7.1(a), counsel for the parties met and conferred regarding motions Defendants intend to file in response to the Complaint;

WHEREAS, the Parties have mutually agreed that additional time is needed to consider and discuss the issues raised by Defendants;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES THAT the time for Defendants to respond to Plaintiff's Complaint shall be extended to July 23, 2012.

**IT IS SO STIPULATED.**

DATED: July 13, 2012

PIGOTT, LTD.

s/Thomas D. Pigott

By: \_\_\_\_\_  
Thomas D. Pigott (0062919)

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Attorneys for Plaintiff Gary Pagels

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DATED: July 13, 2012

COTE LEGAL SERVICES, PLLC

By: s/Matthew D. Côté

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Matthew D. Côté  
Bar No. P74430

COTE LEGAL SERVICES, PLLC  
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Attorneys for Defendants Jesse Willms,  
1524948 Alberta Ltd., Terra Marketing  
Group, and True Net LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2012, I electronically filed the foregoing document with the clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

*Attorneys for Plaintiff:*

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Dated the 13<sup>th</sup> day of July, 2012.

By: s/Matthew D. Coté

Matthew D. Coté  
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